IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

NEAL MILLER and DONNA MILLER, : CIVIL ACTION

Individually and as Administrators of the

Estate of RYAN MILLER, a Minor, Deceased

:

v. : NO. 20-cv-06301-MMB

:

POLICE OFFICER JOSEPH WOLK

PLAINTIFFS' RESPONSE TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

Plaintiffs Neal Miller and Donna Miller, by and through their undersigned counsel, hereby file their Opposition to Defendant's Motion for Summary Judgment pursuant to Federal Rule of Civil Procedure 56. In support of their opposition, Plaintiffs incorporate the attached Memorandum of Law as well as their response to Defendant's Statement of Material Facts as well as their own Counterstatement of Material Facts. Plaintiff respectfully requests that Defendant's Motion for Summary Judgement be denied with prejudice.

Respectfully submitted,

FLAGER & ASSOCIATES, P.C.

By: /s/ Michael S. Levin

Michael S. Levin, Esquire Attorney ID No. 78463 1210 Northbrook Drive, Suite 280 Trevose, PA 19053 (215) 953-5200

michael@flagerlaw.com

Counsel for Plaintiffs

Dated: February 15, 2024